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California Energy Commission

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Mr. Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Comments to the 2016 California Title 24 Residential and Nonresidential Building Energy Efficiency Standards and Associated Documents

Dear Commissioner McAllister,

The National Electrical Manufacturers Association (NEMA) appreciates the opportunity to provide these concerns to you, submitted on behalf of NEMA Residential and Commercial Controls Section member companies.

As you may know, NEMA is the association of electrical equipment and medical imaging manufacturers, founded in 1926 and headquartered in Arlington, Virginia. Its nearly 400 member companies manufacture a diverse set of products including power transmission and distribution equipment, lighting systems, factory automation and control systems, and medical diagnostic imaging systems. The U.S. electroindustry accounts for more than 7,000 manufacturing facilities, nearly 400,000 workers, and over \$100 billion in total U.S. shipments.

We look forward to working with you on this important effort. If you have any questions on these comments, please contact Alex Boesenberg of NEMA at 703-841-3268 or alex.boesenberg@nema.org.

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NEMA Government Relations

Comments to the 2016 California Title 24 Residential and Nonresidential Building Energy Efficiency Standards and Associated Documents

- 1) Regarding the language for Appendix JA5 proposed by CEC staff for the November 3rd workshop, NEMA supports the recommended changes. They do not negatively impact the regulation.
- 2) NEMA was also asked by CEC staff to comment on the proposed changes to JA5 based on the relevant CASE proposal. Our comments follow;

Comments to the CA IOU CASE Team Proposed Appendix JA-5 Changes

Document: http://www.energy.ca.gov/title24/2016standards/prerulemaking/documents/2014-11-03_workshop/comments/Utility_Team_Proposed_Revisions_to_JA5_2014-11-24.pdf

- a) Overall: NEMA disagrees with many of the proposed changes to this Appendix. We are concerned that they do not improve the requirements or their understanding. We detail several reasons for this view in the following comments.
- b) There is no cited need for these changes. The proposal does not identify an existing problem in the field which commends changes to the current regulation. The current regulation is effective and is working. Over 100 products are now qualified to the current regulation¹.
- c) We appreciate the effort made by the IOU team to address concerns that the current regulation is “still ambiguous and some terms are not well defined”. However, in reviewing the proposed changes, NEMA is concerned that the proposed text could increase confusion rather than decrease it. We believe the non-prescriptive text of the existing regulatory language correctly leaves specifics up to the consumers and specifiers to deal with in the field, thus enabling them to find the best compliant solutions for their needs. While some consumers and users may need and request expert guidance and assistance in selecting solutions, this does not mean a change to the regulation is needed. For these issues CEC already establishes training programs, compliance databases and excellent references such as the Residential Compliance Manual (RCM) which states in its introduction “This compliance manual is intended to help plans examiners, inspectors, owners, designers, builders, and energy consultants comply with and enforce California’s 2013 Building Energy Efficiency Standards”². We recommend the CEC adapt and incorporate by reference the recommendations in the IOU’s proposal into the RCM or some other guidance tool, rather than complicate the regulatory text.
- d) During the development of the CASE proposal, and during workshop discussions, industry representatives heard comments that lead us to believe that some interested parties may propose to CEC that embedded WiFi or ZigBee communications interfaces be made mandatory solely in the thermostat, as opposed to allowing those interfaces to be incorporated in other networked solutions. We believe this interest is in response to an assumption that stranded assets due to communications gateway failure or other lost communications pathways are a common condition. NEMA disagrees with this

¹ http://www.energy.ca.gov/title24/equipment_cert/ocst/index.html

² http://www.energy.ca.gov/2013publications/CEC-400-2013-001/chapters/01_Introduction.pdf

assumption because it further assumes that all communications systems do and must come directly from the thermostat. This is not always the case. NEMA points out that vendor-specific communications have redundancies and/or notification tools that will alert owner-operators to communications issues, and thus assist in restoring connectivity. Thermostat manufacturers are concerned that the CEC and IOUs may not fully appreciate the technical limitations of WiFi to perform robustly in connectivity and security in certain building environments.

- e) With respect to the comments on climate controls and communications pathways, it is implied that most, or all, residential climate controls interaction and adjustment is accomplished on a thermostat display screen. This is not true. There are many systems today which allow for portable or IT-based controls (e.g.,. smartphone) which interface wirelessly with the thermostat/control. This allows thermostats to be mounted out of sight as an aesthetic decision. The regulatory text should recognize that temperature controls are not only stand-alone devices, but they can also be part of a system that is not limited to a single device. The current language accommodates these products/systems today through its non-specific description of the requirements. This should continue.